

# STATE OF COLORADO

Bill Owens, Governor  
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

February 26, 2004

Mr. Victor Ketellapper  
Project Manager  
U.S. E.P.A. - Region 8  
999 18<sup>th</sup> Street, Suite 300  
Denver, CO 80202-2466

Re: VBI70 Soil Placement at Asarco Plant Site

Dear Victor:

2004 MAR - 1 PM 7:23  
FBI  
SUPERINTENDENT

This letter serves as an update to the 1994 Plant Site Soils Preliminary Design Report for the Plant Site Operable Unit at the Globe Plant Site. In the Record of Decision (September 2003) for OU1 of the Vasquez Boulevard and I-70 Site (VBI-70), EPA proposed to take soils removed from the residential properties at VBI-70 and transport them to the Asarco Globe Plant Site where they will be used to cover soils containing much higher levels of arsenic, lead, cadmium and zinc.

This plan has been endorsed by the Colorado Department of Public Health and Environment (CDPHE), the Environmental Protection Agency (EPA), and Asarco for several reasons. First, it provides a beneficial use of soils that are non-hazardous and would otherwise be taken to a solid waste landfill. Second, the Globeville community will benefit because the VBI-70 soils will protect residents from the more highly contaminated soils currently exposed at the surface. Further, the reduction of contaminant levels in the surface soils will facilitate future redevelopment of the property, potentially improving the local economy. Finally, using the Globe Plant for soil placement will result in a significant cost saving (estimated at about \$5 Million) for the VBI-70 OU1 project. Because Asarco has experienced serious financial setbacks, it is possible that the only contribution they will be able to make to the VBI-70 site is this in kind offering.

Placement of the VBI-70 OU1 soils at the Globe Plant Site is consistent with the remedy design agreed to by the State and Asarco in the Statement of Work of the Consent Decree for the Globe Plant Site and as stated in Section 1.3.1 of the Plant Site Soils Preliminary Design Report (February 22, 1994). Moreover, EPA has satisfied CDPHE's concerns regarding a number of issues related to soil placement including dust control, air monitoring, and acceptable truck routes to and from the Globe Plant Site.

CDPHE met with Asarco on February 18, 2004 to determine the best sequence for the placement of soils on the Globe Plant Site. The agreed upon phased placement model follows:

Extension of the berm of Escamillia soils on the east side of the Plant Site (F-I 12). Extending the berm will elevate the Plant Site out of the flood plain thus preventing potential movement of contaminated soil off the Site into the neighborhood should there be a flood. The temporary stockpile can remain in place since it helps to achieve this goal and will prevent double handling of materials and potential release of dust into the community. Please refer to the attached map and table to reference grid numbers and the geographically presented analytical information provided for plant site surface soils.

Phase 2:

Soils will be used to cover the slag face (B-E 11). This will provide erosion control of the slag face and beneficial grading of the property for reuse.

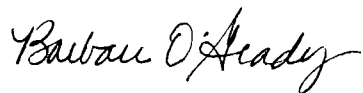
Phase 3:

Highly contaminated surface soils were identified in the northern portion of the Plant Site where historical buildings were located (G-H 11/12). Good drainage has already been achieved around the buildings that remain. The successful completion of the Sedimentation Pond project (K-L 11/12) in the fall of 2003 further addressed a large portion of the area. That project removed approximately 50,000 cubic yards of highly contaminated soil, re-graded about an acre, and covered the surface with 12 inches of clean soil. In addition to that area, a large portion of the highly contaminated area has been "hardscaped" with asphalt and concrete and controlled through drainage modifications. In the third phase of soil placement, we will move out from those areas and cover the peripheral areas of the northeast portion of the Plant Site with approximately a foot of clean soil.

If at any time, the placement of soils at the Globe Plant Site is not compliant with these guidelines and the protection of human health and the environment is in question, CDPHE may require EPA to suspend or terminate placement activities until the situation can be evaluated. At that time, off site disposal would be required. CDPHE remains confident that the parties will work together to implement this plan to produce a mutually beneficial outcome.

Please do not hesitate to contact me at (303) 692-3395 if you have any questions or concerns about this project.

Sincerely,



Barbara O'Grady  
State Project Manager

Attachments

Cc: Ginny Brannon, AGO  
Bob Litle, ASARCO, Inc.  
Gene Hook, DEH  
John Student, DEH  
File: ASA 6.1.4

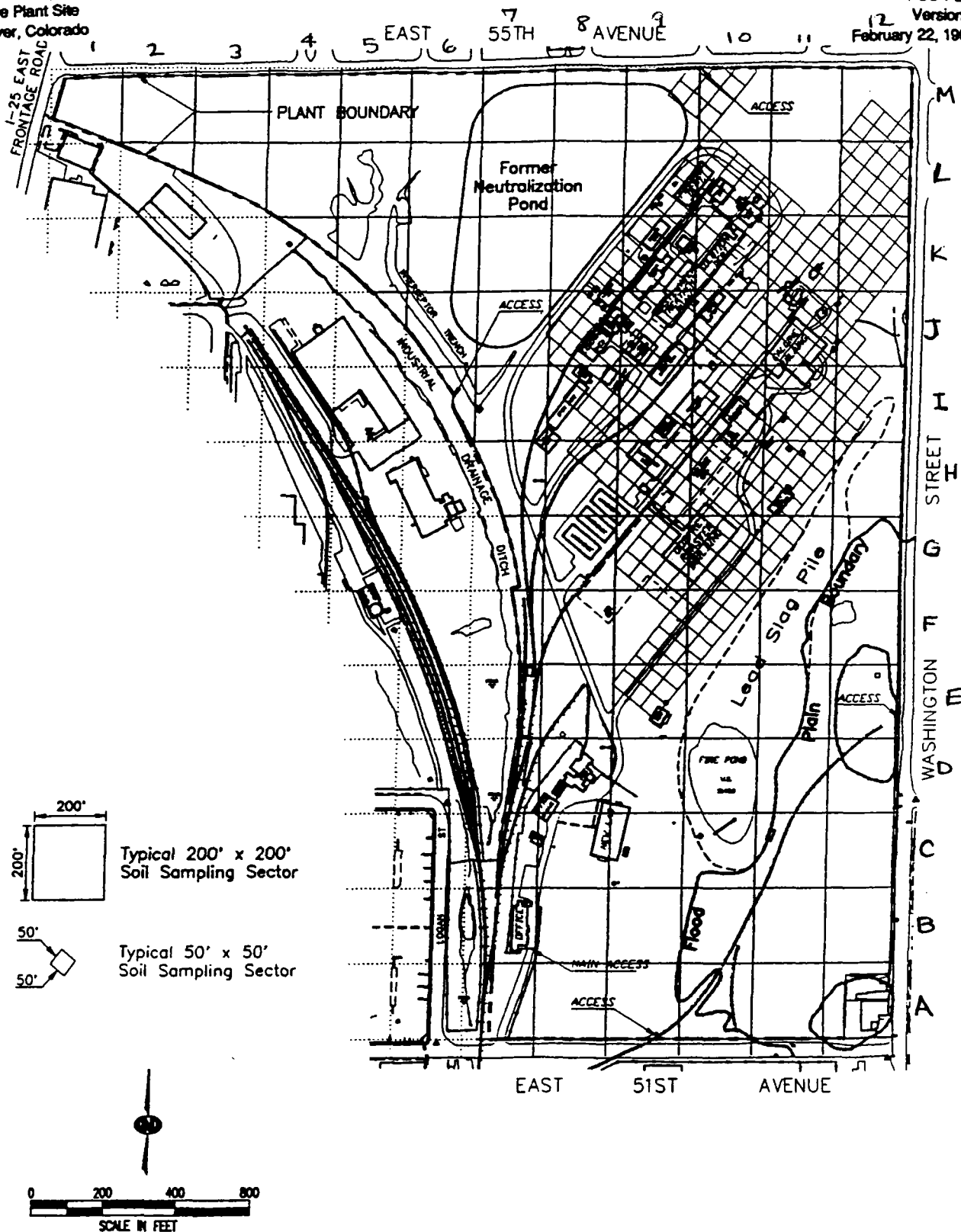


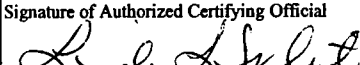
Figure 1.1 Vicinity Map

# FINANCIAL STATUS REPORT

(Short Form)

(Follow Instructions on the back)

Victor Ketellapper, 8 EPR-SK  
FOR YOUR FILE

1. Federal Agency and Organizational Element to Which Report is Submitted <b>U.S. Environmental Protection Agency, Region VIII</b>		2. Federal Grant or Other Identifying Number Assigned By Federal Agency <b>V - 98896801 - 0</b>		OMB Approval No. <b>0348-0038</b>	Page <b>1</b> of <b>1</b> pages
3. Recipient Organization (Name and complete address, including ZIP code)				Colorado Department of Public Health & Environment Mail Code: ASD - ACCT - A5 4300 Cherry Creek Drive South Denver, Colorado 80246-1530	
4. Employer Identification Number <b>84 - 0644739</b>	5. Recipient Identifying Account # <b>HAZ - BQ4 - EPA</b>	6 a. Final Report <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6 b. Annual Report <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7. Basis <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual	
8. Funding/Grant Period (See instructions) From: (Month, Day, Year) <b>07/01/2003</b>		9. Period Covered by this Report From: (Month, Day, Year) <b>7/1/2003</b>		To: (Month, Day, Year) <b>12/31/2003</b>	
10. Transactions:		I Previously Reported	II This Period	III Cumulative	
a. Total outlays			<b>\$45,226.00</b>	<b>\$45,226.00</b>	
b. Recipient Share of outlays			<b>\$0.00</b>	<b>\$0.00</b>	
c. Federal share of outlays			<b>\$45,226.00</b>	<b>\$45,226.00</b>	
d. Total unliquidated obligations				<b>\$0.00</b>	
e. Recipient share of unliquidated obligations				<b>\$0.00</b>	
f. Federal share of unliquidated obligations				<b>\$0.00</b>	
g. Total Federal share (Sum of lines c and f)				<b>\$45,226.00</b>	
h. Total Federal funds authorized for this funding period				<b>\$45,500.00</b>	
i. Unobligated balance of Federal funds (Line h minus line g)				<b>\$274.00</b>	
11. Indirect Expense		a. Type of Rate (Place "X" on appropriate line) Provisional                      Predetermined                      Final <input checked="" type="checkbox"/> Fixed			
		b. Rate <b>* Varies</b>	c. Base <b>\$44,505.00</b>	d. Total Amount <b>\$721.00</b>	e. Federal Share <b>\$45,226.00</b>
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation. <b>\$2,609.00 @ 16.4%</b> <b>\$41,896.00 @ .7%</b>					
13. Certification: I certify to the best of my knowledge and belief that this report is correct and complete and that all outlays and unliquidated obligations are for the purposes set forth in the award documents.					
Typed or Printed Name and Title <b>Linda L. White, Accountant III</b>				Telephone (area code, number and extension) <b>(303) 692 - 2127</b>	
Signature of Authorized Certifying Official 				Date Report Submitted <b>3/26/04</b>	

Previous Editions not Usable

Standard Form 269A (REV 4-88)

Prescribed by OMB Circulars A-102 and A-110